

**DECLARATION of RACHEL ROYSTON, CFE, CAMS**

I, Rachel Royston, do hereby declare:

**BACKGROUND/EXPERIENCE**

1. I am a Financial Investigator under contract with the United States Attorney's Office in Portland, Oregon where I have been so employed since May 2021. Prior to holding this position, I was employed by the State of Oregon for 14 years, most recently as an Enforcement Investigator for the Division of Financial Regulation (DFR). I have a Bachelor of Science degree in Business and Accounting and hold credentials as a Certified Fraud Examiner (CFE) and Certified Anti Money Laundering Specialist (CAMS). Throughout my professional career, I have conducted numerous complex financial investigations, interviewed hundreds of people, and analyzed thousands of records. I have intimate knowledge of the various financial systems and broad experience with analyzing financial transactions to trace funds, build financial profiles, and identify money laundering methods. I have conducted and received specialized training in the detection and investigation of money laundering techniques.

**PURPOSE OF THIS DECLARATION**

2. This declaration is offered in support of a complaint *in rem* seeking forfeiture of the following:
  - a. Thirteen (13) real properties, hereafter referred to collectively as the "Defendant Real Properties," listed below and more fully described in Attachment A to this declaration.

**Defendant Property 1:** 56713 Dancing Rock Loop, Bend, Oregon 97707

**Defendant Property 2:** 1425 SE 148<sup>th</sup> Avenue, Portland, Oregon 97233

**Defendant Property 3:** 4686 W Powell Blvd., Unit 241, Gresham, Oregon 97030

**Defendant Property 4:** 56866 Enterprise Drive, Unit 10, Sunriver, Oregon 97707

**Defendant Property 5:** 5415 NE 134<sup>th</sup> Street, Vancouver, Washington 98686

**Defendant Property 6:** 812 Hawk Drive, Silverton, Oregon 97381

**Defendant Property 7:** 13109 NE 60<sup>th</sup> Avenue, Vancouver, Washington 98686

**Defendant Property 8:** 15398 SE Clark Street, Happy Valley, Oregon 97086

**Defendant Property 9:** 79360 Four Paths Lane, Indio, California 92203

**Defendant Property 10:** 6708 NE 223<sup>rd</sup> Circle, Battle Ground, Washington 98604

**Defendant Property 11:** 172 SE 117<sup>th</sup> Avenue, Portland, Oregon 97216

**Defendant Property 12:** 15337 SE Lewis Street, Happy Valley, Oregon 97086

**Defendant Property 13:** 32875 SE Brooks Road, Boring, Oregon 97009

- b. \$558,588.25 U.S. currency, in lieu of real property located at 6222 NE 133<sup>rd</sup> Way, Vancouver, Washington; and
- c. All funds contained within fifteen (15) LPL Financial brokerage accounts and four (4) OnPoint Community Credit Union Accounts, hereafter referred to collectively as the “Defendant Accounts,” previously seized in this district pursuant to a seizure warrant, as listed below and more fully described in Attachment B to this declaration.

LPL Financial Accounts:

7026-0343 – in the name of Lebedenko Family Trust;

1067-0573 – in the name of PTC Cust 5305 SEP IRA FBO Sergey V Lebedenko;

2939-0592 – in the name of Yekaterina Dickinson;

3494-1593 – in the name of PTC Cust 5305 SEP IRA FBO Aliona Lebedenko;

**Declaration of Rachel Royston, CFE, CAMS**

**EXHIBIT A PAGE 2**  
Complaint *In Rem*  
FOR FORFEITURE

3253-2037 – in the name of N650SM LLC;  
5472-2209 – in the name of PTC Cust 5305 SEP IRA FBO Aliona Canche;  
3126-2569 – in the name of Aliona Canche TOD Account;  
5271-3034 – in the name of Sergey & Galina Lebedenko JTEN TOD;  
1165-4512 – in the name of PTC Cust 5305 SEP IRA FBO Galina Lebedenko;  
7124-4613 – in the name of PTC Cust ROTH IRA FBO Aliona Canche;  
6216-6310 – in the name of PTC Cust ROTH IRA FBO Marcus Lee Dickinson;  
7480-6527 – in the name of Sergey & Galina Lebedenko JTEN TOD;  
2959-6702 – in the name of Yekaterina Dickinson TOD Account;  
1674-7683 – in the name of PTC Cust 5305 SEP IRA FBO Yekaterina  
Lebedenko;  
5721-7733 – in the name of PTC Cust ROTH IRA FBO Yekaterina Lebedenko.

OnPoint CCU Accounts:

1012808-1 Sergey and Galina Lebedenko Personal Savings  
1012808-8 Sergey and Galina Lebedenko Personal Checking  
1291730-22 Astra Car Service c/o Sergey Lebedenko Business Checking  
1291730-1 Astra Car Service c/o Sergey Lebedenko Business Savings

The property outlined above is property constituting or derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, wire fraud, and is property involved in or traceable to property involved in a violation of 18 U.S.C. § 1956, laundering of monetary instruments. The property is therefore subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C).

3. The information contained in this declaration is information known to me from my training and experience, by personal knowledge, and by written and oral reports provided by witnesses and law enforcement officers involved in the investigation. Since this declaration is being submitted for the limited purpose of a complaint *in rem* for forfeiture, I have not

**Declaration of Rachel Royston, CFE, CAMS**

**EXHIBIT A PAGE 3**  
Complaint *In Rem*  
FOR FORFEITURE

included each and every fact known to me concerning this investigation but only information sufficient to show probable cause that the properties, currency, and accounts in question are subject to forfeiture. This declaration involves an investigation by the Federal Bureau of Investigation (FBI) and the Internal Revenue Service Criminal Investigations Unit (IRS-CI) into Sergey and Galina Lebedenko (husband and wife).

#### **SUMMARY OF THE INVESTIGATION**

4. The FBI initiated an investigation regarding Sergey and Galina Lebedenko (the “Lebedenkos”) based on information provided by representatives of the Portland-based litigation firm, Angeli Law Group LLC (“ALG”). ALG was engaged to represent the victim (“V-1”)<sup>1</sup> in this matter. ALG presented information alleging that between approximately November 2016 and November 2023, the Lebedenkos, through their wholly owned company Astra Car Service, LLC, stole over \$34 million from V-1.
5. On January 22, 2023, the Lebedenkos were charged via criminal complaint with wire fraud and money laundering related to the conduct described in this declaration. They were subsequently charged via Indictment on February 21, 2024, and are currently on pretrial release.
6. On May 28, 2004, the Lebedenkos filed an application for registration with the Oregon Secretary of State Corporation Division for Astra Limousine and Town Car Service, (Registry No. 222266-90). On April 12, 2016, the Lebedenkos filed articles of organization with the Oregon Secretary of State Corporation Division for Astra Car Service, LLC (Registry No. 1206409-90).

---

<sup>1</sup> For the purposes of this declaration, the victim, known by law enforcement, will be referred to as V-1.

7. In or around 2007, V-1 hired Sergey Lebedenko (hereinafter “Sergey”) to provide intermittent personal transportation services. Sergey originally charged V-1 \$90 an hour. In the following years, Sergey convinced V-1 to give him more responsibility with managing various aspects of V-1’s personal estate, including but not limited to oversight for maintenance and groundskeeping staff. When the business relationship evolved to include these additional responsibilities, V-1 discussed reducing the rate to half the original \$90 per hour.
8. Sergey quickly gained the trust of V-1. Since Sergey was not a full-time employee, he was not paid on a scheduled basis and was not paid through any payroll. Sergey was eventually given authorization to charge V-1’s American Express (AMEX) credit card for the sole purpose of payment for actual services rendered. Monthly statements for the AMEX card were typically delivered to V-1’s New York apartment so they were not seen by V-1. The AMEX card was also set up on autopay so that the balance would be automatically paid off each month using funds from V-1’s personal bank account.
9. The extraordinary charges to V-1’s AMEX included many charges for alleged services when V-1 and his partner were not even in the Portland area. For example, during the seven-day period from April 24 to April 30, 2022, the Lebedenkos charged V-1’s AMEX card 180 times for a total amount of \$497,490. During that time, V-1 and his partner were not in Portland and had minimal interaction with Sergey.
10. The investigation identified bank accounts held at OnPoint Community Credit Union (“OnPoint”) that are owned by the Lebedenkos. Records were obtained from OnPoint for the Lebedenkos’ accounts. These accounts are listed above and contained in Attachment B.

11. Records show that Astra's business checking account ending 1730-22 was opened on August 31, 2017, and began receiving funds for processed transactions through a merchant service (credit card) processor. A preliminary review of the Astra account identified approximately \$33.5 million in merchant service deposits between August 2017 and December 2023.
12. An analysis of V-1's AMEX transactions identified charges by Astra for the same time period totaling approximately \$33.4 million. These records suggest that charges to V1's AMEX were the primary source of income for the Lebedenkos.
13. ALG provided a preliminary list of real properties that they believed were purchased by the Lebedenkos using the funds stolen from V-1. The investigation determined that each of the real properties had been purchased by the Lebedenkos, either personally or through the Lebedenko Family Trust and the Lebedenko Restated Family Trust.
14. Records were obtained from several title companies related to the purchases of the Defendant Real Properties. The initial review of those records showed that several of the Defendant Real Properties were funded by checks and wires from the OnPoint accounts, as well as wire transfers from brokerage accounts held at Edward Jones and LPL Financial.
15. Financial records obtained from Edward Jones revealed fourteen (14) brokerage accounts held in the names of the Lebedenkos, the Trust, or their family members. For the purposes of this declaration, the following three Edward Jones accounts (which were later closed) were identified as having been used to fund the purchase of several of the Defendant Real Properties.
  - a. 855-18218-1-5 Lebedenko Family Trust U/A 05/29/2019
  - b. 855-20378-1-7 Sergey & Galina Lebedenko
  - c. 855-21893-1-1 Sergey & Galina Lebedenko

**Declaration of Rachel Royston, CFE, CAMS**

**EXHIBIT A PAGE 6**  
Complaint *In Rem*  
FOR FORFEITURE

Review of these Edward Jones accounts reveals they were primarily funded by transfers from the OnPoint accounts referenced above.

16. Records obtained from LPL Financial revealed fifteen (15) brokerage accounts that were opened in and around April 2023 using closeout transfers from all the Edward Jones accounts. These LPL Financial accounts are those identified in Attachment B to this declaration.
17. On January 31, 2024, seizure warrants for the fifteen LPL Financial accounts and the four OnPoint accounts were signed by Judge Armistead and were served on OnPoint Community Credit Union and LPL Financial (3:24-mc-107 A-S). The Application and supporting Affidavit for those warrants are attached hereto and incorporated herein as Attachment C. The OnPoint bank accounts were seized, and the balances totaling \$16,155.64 were transferred via check to the United States Marshals Service. The 15 LPL Financial accounts were also seized (but not liquidated), with the balances as of January 31, 2024, totaling \$4,145,114.75.
18. All financial and title records obtained throughout this investigation were analyzed and the following transactions were identified in connection with the acquisition of the Defendant Real Properties.
19. **Defendant Property 1:** 56713 Dancing Rock Loop, Bend, Oregon 97707
  - a. Title records revealed that Defendant Property 1 was purchased on November 30, 2018, for a sale price of \$200,000. At the time, the property was bare land. A home was later built on the property. The buyer was listed as Sergey and Galina Lebedenko. On November 30, 2018, First American Title Insurance Company received a \$202,893.16 wire transfer for the purchase of Defendant Property 1. This wire

originated from the Lebedenkos' OnPoint personal savings account ending in 2808-1.

On May 30, 2019, the property was transferred from the Lebedenkos individually to the Lebedenko Family Trust.

**20. Defendant Property 2:** 1425 SE 148<sup>th</sup> Avenue, Portland, Oregon 97233

- a. Title records revealed that Defendant Property 2 was purchased on February 8, 2019, for a sale price of \$84,186.97. The buyer was listed as Sergey and Galina Lebedenko. On February 7, 2019, Fidelity National Title of Oregon received an \$87,095.07 wire transfer for the purchase of Defendant Property 2. This wire originated from the Lebedenkos' OnPoint personal savings account ending in 2808-1. On June 3, 2019, the property was transferred from the Lebedenkos individually to the Lebedenko Family Trust.

**21. Defendant Property 3:** 4686 W Powell Blvd., Unit 241, Gresham, Oregon 97030

- a. Title records revealed that Defendant Property 3 was purchased on October 20, 2020, for a sale price of \$220,000. The buyer was listed as The Lebedenko Family Trust. Lawyers Title of Oregon received a \$2,500 down payment via check no. 3211, dated October 9, 2020, drawn on the Lebedenkos' OnPoint personal checking account ending in 2808-8. Lawyers Title of Oregon later received the remaining payment of \$219,994.38 via cashier's check no. 020360704, dated October 19, 2020. The funds used to purchase this check were withdrawn from the Lebedenkos' OnPoint personal savings account ending in 2808-1.

**22. Defendant Property 4:** 56866 Enterprise Drive, Unit 10, Sunriver, Oregon 97707

- a. Title records revealed that Defendant Property 4 was purchased on September 3, 2021, for a sale price of \$470,000. The buyer was listed as The Lebedenko Restated



Family Trust. On September 3, 2021, First American Title Insurance Co. received a \$471,391.03 wire transfer for the purchase of Defendant Property 4. This wire transfer originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8.

**23. Defendant Property 5:** 5415 NE 134<sup>th</sup> Street, Vancouver, Washington 98686

- a. Title records revealed that Defendant Property 5 was purchased on October 29, 2021, for a sale price of \$600,000. The buyer was listed as Sergey and Galina Lebedenko, Trustees of The Lebedenko Restated Family Trust. On October 25, 2021, WFG National Title Company received a \$6,000 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8. On October 28, 2021, WFG National Title Company received a \$596,714.31 wire transfer for the remaining balance that originated from the Lebedenkos' OnPoint personal savings account ending in 2808-1.

**24. Defendant Property 6:** 812 Hawk Drive, Silverton, Oregon 97381

- a. Title records revealed that Defendant Property 6 was purchased on November 30, 2021, for a sale price of \$70,000. At the time, the property was bare land. A home was later built on the property. The buyer was listed as S&G Construction. S&G Construction was registered with the Oregon Secretary of State Corporation Division on November 19, 2021 (Registry No. 1895828-94). The business lists Defendant Property 1 as the mailing address and principal place of business, and Sergey and Galina Lebedenko as members. AmeriTitle received a \$700 down payment via check no. 3394, dated November 5, 2021, drawn on the Lebedenkos' OnPoint personal checking account ending in 2808-8. On November 29, 2021, AmeriTitle received the

remaining payment of \$70,536.29 via wire transfer from the Lebedenkos' OnPoint personal savings account ending in 2808-1.

**25. Defendant Property 7:** 13109 NE 60<sup>th</sup> Avenue, Vancouver, Washington 98686

- a. Title records revealed that Defendant Property 7 was purchased on March 1, 2022, for a sale price of \$603,000. The buyer was listed as The Lebedenko Restated Family Trust. On January 19, 2022, First American Title Insurance Co. received a \$6,000 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8. On February 28, 2022, First American Title Insurance Co. received a \$599,736.29 wire transfer for the remaining balance that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8.

**26. Defendant Property 8:** 15398 SE Clark Street, Happy Valley, Oregon 97086

- a. Title records revealed that Defendant Property 8 was purchased on May 6, 2022, for a sale price of \$915,000. The buyer was listed as The Lebedenko Restated Family Trust. On April 12, 2022, Lawyers Title of Oregon received a \$10,000 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8. On May 6, 2022, Lawyers Title of Oregon received a \$907,477.60 wire transfer for the remaining balance that originated from the Lebedenkos' personal brokerage account 855-20378-1-7 at Edward Jones. It is believed that Defendant Property 8 is the current residence of the Lebedenkos' daughter Aliona Canche and her family.

**27. Defendant Property 9:** 79360 Four Paths Lane, Indio, California 92203

- a. Title records revealed that Defendant Property 9 was purchased on June 1, 2022, for the sale price of \$2,100,000. The buyer was listed as The Lebedenko Restated Family Trust dated April 30, 2021, Sergey Lebedenko and Galina Lebedenko. On April 13, 2022, Countrywide Escrow received a \$72,000 down payment via check no. 3473 written on the Lebedenkos' OnPoint personal checking account ending in 2808-8. On May 31, 2022, Countrywide Escrow received a \$2,332,971.23 wire transfer for the remaining balance that originated from the Lebedenko Family Trust brokerage account 855-18218-1-5 at Edward Jones.

**28. Defendant Property 10:** 6708 NE 223<sup>rd</sup> Circle, Battle Ground, Washington 98604

- a. Title records revealed that Defendant Property 10 was purchased on July 19, 2022, for the sale price of \$1,090,000. The buyer was listed as Sergey and Galina Lebedenko. On July 13, 2022, Chicago Title Company of Washington received a \$10,000 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8. On July 19, 2022, Chicago Title Company received a \$1,082,529.06 wire transfer for the remaining balance that originated from the Lebedenkos' personal brokerage account 855-20378-1-7 at Edward Jones.
- b. On October 31, 2023, a quit claim deed was filed in Clark County, Washington, in which the Lebedenkos gifted Defendant Property 10 to Vasiliy and Olga Yarosh for no consideration. Vasiliy Yarosh is the pastor at New Beginnings Church in Portland, Oregon. New Beginnings has received in excess of \$650,000 in donations from the Lebedenkos over the last six years. On October 30, 2023, the Yaroshes signed a

- promissory note for \$420,000 with the lender listed as 6207 NE 60<sup>th</sup> Ave. LLC, a Washington registered company owned by Yury Strachuk.
- c. On October 31, 2022, Chicago Title dispersed the loan proceeds to the Yaroshes via wire transfer. Two weeks later, on November 11, 2023, Vasiliy Yarosh wrote a check in the amount of \$150,000 from his personal account at Chase Bank. The check was made payable to Sergey and was deposited into the Lebedenko's OnPoint personal checking account ending in 2808-8.

**29. Defendant Property 11:** 172 SE 117<sup>th</sup> Avenue, Portland, Oregon 97216

- a. Title records revealed that Defendant Property 11 was purchased on September 20, 2022, for a sale price of \$231,000. The buyer was listed as Sergey and Galina Lebedenko. On September 12, 2022, Fidelity National Title Company of Oregon received a \$5,100 down payment via check no. 3574 written on the Lebedenkos' OnPoint personal checking account ending in 2808-8. On September 20, 2022, Fidelity National Title Company received a \$226,284.18 wire transfer for the remaining balance that originated from the Lebedenkos' personal brokerage account 855-20378-1-7 at Edward Jones.

**30. Defendant Property 12:** 15337 SE Lewis Street, Happy Valley, Oregon 97086

- a. Title records revealed that Defendant Property 12 was purchased on March 11, 2022, for the sale price of \$900,000. The buyer was listed as The Lebedenko Restated Family Trust. On March 17, 2022, Lawyers Title of Oregon received a \$8,500 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal savings account ending in 2808-1. On March 10, 2022, Lawyers Title received a \$895,072.67 wire transfer for the remaining balance that originated from the

Lebedenkos' personal brokerage account 855-21893-1-1 at Edward Jones. It is believed that Defendant Property 12 is the current residence of the Lebedenkos' daughter Yekaterina Dickinson and her family.

**31. Defendant Property 13:** 32875 SE Brooks Road, Boring, Oregon 97009

- a. Title records revealed that Defendant Property 13 was purchased on September 11, 2023, for the sale price of \$600,000 plus closing costs. The buyer was listed as The Lebedenko Restated Family Trust. On August 29, 2023, First American Title Insurance Company received a \$6,000 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8. On September 11, 2023, First American Title received a \$601,930.50 wire transfer for the remaining balance that originated from the Lebedenkos' personal brokerage account 5271-3034 at LPL Financial.

**32. \$558,588.25 U.S. currency in lieu of property:** 6222 NE 133<sup>rd</sup> Way, Vancouver, Washington 98686

- a. Title records revealed that the above referenced real property was purchased on September 8, 2022, for a sale price of \$615,000. The buyer was listed as Sergey Lebedenko and Galina Lebedenko, Trustees of The Lebedenko Restated Family Trust dated April 30, 2021. On August 26, 2022, WFG National Title Company received a \$6,000 down payment via wire transfer that originated from the Lebedenkos' OnPoint personal checking account ending in 2808-8. On September 14, 2022, WFG National Title Company received a \$611,847.76 wire transfer for the remaining balance that originated from the Lebedenkos' personal brokerage account 855-20378-1-7 at Edward Jones.

b. On January 2, 2024, this property was listed for sale. An offer in the amount of \$599,000 was accepted by the Lebedenkos with the consent of the government, and the sale was finalized on March 5, 2024. That same day, based on an agreement between the government and the Lebedenkos' counsel, net proceeds from the sale were sent via wire transfer from WFG National Title Insurance Company to the Treasury Forfeiture Funds Suspense account in the amount of \$558,588.25. The government is therefore pursuing the forfeiture of that \$558,588.25 in lieu of forfeiture of the real property.

### CONCLUSION

33. Based on the facts set forth herein, I believe that probable cause exists to show that the Thirteen Defendant Properties, the \$558,588.25 U.S. currency, the fifteen LPL Financial brokerage accounts and the four OnPoint accounts are property constituting or derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, wire fraud, and property involved in or traceable to property involved in a violation of 18 U.S.C. § 1956, laundering of monetary instruments, and are therefore subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C).

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. §1746.

Executed this 19th day of March 2024.

s/ Rachel Royston  
Rachel Royston, CFE, CAMS  
United States Attorney's Office

**Declaration of Rachel Royston, CFE, CAMS**

**EXHIBIT A PAGE 14**  
Complaint *In Rem*  
FOR FORFEITURE

**Attachment A**

**Defendant Real Properties**

**Defendant Property 1:** 56713 Dancing Rock Loop, Bend, Oregon 97707

APN: 201108 BA 01500

The following described real property, situated in the County of Deschutes, State of Oregon:

LOT 83, CALDERA SPRINGS, PHASE ONE, DESCHUTES COUNTY, OREGON

Tax ID: 252116

**Defendant Property 2:** 1425 SE 148th Ave, Portland, Oregon 97233

APN: 1S2E01BD 07500

The following described real property, situated in the County of Multnomah, State of Oregon:

The East 175 feet of the South 64 feet of Lot 3, Block 23, CORRECTED PLAT OF NEWHURST PARK, in the City of Portland, County of Multnomah and State of Oregon.

EXCEPTING that portion conveyed to Multnomah County for road purposes by order recorded November 13, 2971 in Book 825, Page 180, Deed Records of Multnomah County, Oregon.

And more commonly known as 1425 SE 148th Avenue, Portland, Oregon 97233.

Tax ID: R225494

**Defendant Property 3:** 4686 W Powell Blvd., Unit 241, Gresham, Oregon 97030

APN: 1S3E07DD 90132

Situated in the County of Multnomah, State of Oregon:

Unit 241, EMERALD VALLEY CONDOMINIUM STAGE 3, in the City of Gresham, County of Multnomah and State of Oregon. TOGETHER WITH an undivided interest in the general common elements appertaining to said unit as described in said Declaration of Unit Ownership, TOGETHER WITH those limited common elements appertaining to said unit as described in said Declaration of Unit Ownership, recorded November 29, 1999, Recorder's Fee No. 99-215378 and any amendments and/or supplemental(s) thereto.

Tax ID: R491018

**Defendant Property 4:** 56866 Enterprise Drive, Unit 10, Sunriver, Oregon 97707

Map & Tax Lot No.: 201105D080010

Real property in the County of Deschutes, State of Oregon, described as follows:

UNIT 10 OF COMPOUND CONDOMINIUMS, DESCHUTES COUNTY, OREGON, DESCRIBED IN AND SUBJECT TO THAT CERTAIN DECLARATION OF CONDOMINIUM OWNERSHIP RECORDED APRIL 18, 2007 IN INSTRUMENT NO. 2007-22303, DESCHUTES COUNTY RECORDS, TOGETHER WITH THE LIMITED AND GENERAL COMMON ELEMENTS AS SET FORTH AND DESCRIBED HEREIN, APPERTAINING TO SAID UNIT.

Tax ID: 257146

**Defendant Property 5:** 5415 NE 134th Street, Vancouver, Washington 98686

The following described real estate, situated in the County of Clark, State of Washington:

Lot 52, PHILBROOK FARMS P.U.D. PHASE 1, according to the plat thereof, recorded in Volume 311 of Plats, page 863, records of Clark County, Washington.

Tax ID: 986040-848

**Defendant Property 6:** 812 Hawk Drive, Silverton, Oregon 97381

Map No. 071W01BA00600

The following described real property in the County of Marion and State of Oregon free of encumbrances except as specifically set forth herein:

Lot 168, PIONEER VILLAGE-PHASE 3, in the City of Silverton, Marion County, Oregon.

Tax ID: 342589

**Defendant Property 7:** 13109 NE 60th Avenue, Vancouver, Washington 98686

Real property in the County of Clark, State of Washington, described as follows:

LOT 216, PHILBROOK FARMS P.U.D. PHASE 2, ACCORDING TO THE PLAT THEREOF, RECORDED IN VOLUME 311 OF PLATS, PAGE 910, RECORDS OF CLARK COUNTY, WASHINGTON.

Tax ID: 986043174



**Defendant Property 8:** 15398 SE Clark Street, Happy Valley, Oregon 97086

APN: 12E25DB02900

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Clackamas, State of Oregon:

Lot 29, PIONEER HIGHLANDS, in the City of Happy Valley, County of Clackamas and State of Oregon, Recorded August 18, 2016 as Recorder's Fee No. 2016-055948.

Subject to:

1. Easement(s) for the purpose(s) shown below and rights incidental thereto, as granted in a document:

Granted to: City of Happy Valley

Purpose: Conservation Easement

Recording Date: August 18, 2016

Recording No.: 2016-055949

Affects: Reference is hereby made to said document for full particulars

2. Covenants, conditions and restrictions but omitting any covenants or restrictions, if any, including but not limited to those based upon age, race, color, religion, sex, sexual orientation, familial status, marital status, disability, handicap, national origin, ancestry, or source of income, as set forth in applicable state or federal laws, except to the extent that said covenant or restriction is permitted by applicable law, as set forth in the document

Recording Date: August 18, 2016

Recording No: 2016-055951

3. Declaration and Maintenance Agreement for On Site Stormwater Facilities

Recording Date: August 18, 2016

Recording No.: 2016-055952

4. Declaration of Covenants, Conditions and Restrictions for Transfer of Excess Development Rights

Recording Date: August 18, 2016

Recording No.: 2016-055953.

Tax ID: 05030937

**Defendant Property 9:** 79360 Four Paths Lane, Indio, California 92203

All the following described real property in the County of Riverside, State of California:

LOT 136 OF TRACT NO. 2606, IN THE COUNTY OF RIVERSIDE, STATE OF CALIFORNIA, AS SHOWN BY MAP ON FILE IN BOOK 45, PAGE(S) 91 TO 97 INCLUSIVE OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

Tax ID: 609-340-027

Note: Plat Map Unavailable

**Defendant Property 10:** 6708 NE 223rd Circle, Battle Ground, Washington 98604

The following described real estate, situated in the County of Clark, State of Washington, together with all after acquired title of the grantor(s) herein:

Lot(s) 2, OAK MEADOW ESTATES PRELIMINARY APPROVED AS OAK MEADOWS, Volume 311, Page 947.

Tax ID: 986045354

**Defendant Property 11:** 172 SE 117th Avenue, Portland, Oregon 97216

Map No. 1N2E34DD-04701

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Multnomah, State of Oregon:

Parcel I:

The North Half of Lots 47 and 48, Block 26, VENTURA PARK, in the City of Portland, County of Multnomah and State of Oregon.

Parcel II:

The South half of Lots 47 and 48, Block 26, VENTURA PARK, in the City of Portland, County of Multnomah and State of Oregon.

Tax ID: R713708

\*Note – Plat Map Unavailable

**Defendant Property 12:** 15337 SE Lewis Street, Happy Valley, Oregon 97086

APN: 12E25DB02000

The following described real property, free and clear of encumbrances except as specifically set forth below, situated in the County of Clackamas, State of Oregon:

Lot 20, PIONEER HIGHLANDS, recorded August 18, 2016 as Document No. 2016-055948, in the City of Happy Valley, County of Clackamas and State of Oregon.

Subject to:

1. Covenants, conditions and restrictions but omitting any covenants or restrictions, if any, including but not limited to those based upon age, race, color, religion, sex, sexual orientation, familial status, marital status, disability, handicap, national origin, ancestry, source of income, gender identity, gender expression, medical condition or genetic information, as set forth in applicable state or federal laws, except to the extent that said covenant or restriction is permitted by applicable law, as set forth in the document

Recording Date: August 18, 2016

Recording No: 2016-055951

2. Declaration and Maintenance Agreement for Onsite Stormwater Facilities

Recording Date: August 18, 2016

Recording No.: 2016-055952

3. Covenants, Conditions and Restrictions as set forth in the document

Purpose: Transfer of Excess Development Rights

Recording Date: August 18, 2016

Recording No.: 2016-055953

Tax ID: 05030928

**Defendant Property 13:** 32875 SE Brooks Road, Boring, Oregon 97009

Map No. 14E33B 00901

Real property in the County of Clackamas, State of Oregon, described as follows:

PARCEL 3, PARTITION PLAT NO. 2007-120, IN THE CITY OF BORING, COUNTY OF CLACKAMAS AND STATE OF OREGON.

Tax ID: 05000008

**Attachment B**  
**Defendant Accounts**

LPL Financial accounts:

1.	7026-0343	Lebedenko Family Trust 05/29/2019	\$143,164.92
2.	1067-0573	PTC Cust 5305 SEP IRA FBO Sergey V Lebedenko	\$283,650.45
3.	2939-0592	Yekaterina Dickinson	\$148,509.04
4.	3494-1593	PTC Cust 5305 SEP IRA FBO Aliona Lebedenko	\$0
5.	3253-2037	N650SM LLC	\$8,578.91
6.	5472-2209	PTC Cust 5305 SEP IRA FBO Aliona Canche	\$43,066.39
7.	3126-2569	Aliona Canche TOD Account	\$74,969.65
8.	5271-3034	Sergey & Galina Lebedenko JTEN TOD	\$1,616,530.66
9.	1165-4512	PTC Cust 5305 SEP IRA FBO Galina Lebedenko	\$199,466.51
10.	7124-4613	PTC Cust ROTH IRA FBO Aliona Canche	\$5,696.69
11.	6216-6310	PTC Cust ROTH IRA FBO Marcus Lee Dickinson	\$6,504.83
12.	7480-6527	Sergey & Galina Lebedenko JTEN TOD	\$1,433,483.77
13.	2959-6702	Yekaterina Dickinson TOD Account	\$95,966.02
14.	1674-7683	PTC Cust 5305 SEP IRA FBO Yekaterina Lebedenko	\$60,233.69
15.	5721-7733	PTC Cust ROTH IRA FBO Yekaterina Lebedenko	\$25,293.22

OnPoint Community Credit Union accounts:

1.	1012808-1	Sergey and Galina Lebedenko	\$10,096.52
2.	1012808-8	Sergey and Galina Lebedenko	\$374.65
3.	1291730-22	Astra Car Service c/o Sergey Lebedenko	\$5,519.65
4.	1291730-1	Astra Car Service c/o Sergey Lebedenko	\$164.82

UNITED STATES DISTRICT COURT

for the  
District of Oregon  
Portland Division



Certified to be a true and correct  
copy of original filed in this District

Dated: **02/01/2024**

**MELISSA AUBIN**, Clerk of Court  
U.S. District Court of Oregon

By: **s/F. Patterson**

Pages 1 Through 17

**In the Matter of the Seizure of**

**Case No. 3:24-mc-107 A-S**

**All funds and securities contained in the following  
LPL Financial Accounts:**

- i. **7026-0343** – in the name of Lebedenko Family Trust;
- ii. **1067-0573** – in the name of PTC Cust 5305 SEP IRA FBO Sergey V Lebedenko;
- iii. **2939-0592** – in the name of Yekaterina Dickinson;
- iv. **3494-1593** – in the name of PTC Cust 5305 SEP IRA FBO Aliona Lebedenko;
- v. **3253-2037** – in the name of N650SM LLC;
- vi. **5472-2209** – in the name of PTC Cust 5305 SEP IRA FBO Aliona Canche;
- vii. **3126-2569** – in the name of Aliona Canche TOD Account;
- viii. **5271-3034** – in the name of Sergey & Galina Lebedenko JTEN TOD;
- ix. **1165-4512** – in the name of PTC Cust 5305 SEP IRA FBO Galina Lebedenko;
- x. **7124-4613** – in the name of PTC Cust ROTH IRA FBO Aliona Canche;
- xi. **6216-6310** – in the name of PTC Cust ROTH IRA FBO Marcus Lee Dickinson;
- xii. **7480-6527** – in the name of Sergey & Galina Lebedenko JTEN TOD;
- xiii. **2959-6702** – in the name of Yekaterina Dickinson TOD Account;
- xiv. **1674-7683** – in the name of PTC Cust 5305 SEP IRA FBO Yekaterina Lebedenko;
- xv. **5721-7733** – in the name of PTC Cust ROTH IRA FBO Yekaterina Lebedenko;

**All funds contained within the following OnPoint  
Community Credit Union Accounts:**

- i. **1012808-1** – in the names of Sergey & Galina Lebedenko;
- ii. **1012808-8** – in the names of Sergey & Galina Lebedenko;
- iii. **1291730-1** – in the name of Astra Car Service LLC c/o Sergey Lebedenko; and
- iv. **1291730-22** – in the name of Astra Car Service LLC c/o Sergey Lebedenko

**APPLICATION FOR A WARRANT TO SEIZE PROPERTY SUBJECT TO FORFEITURE  
BY TELEPHONE OR RELIABLE ELECTRONIC MEANS**

I, JARED ROLLINS, being duly sworn, do depose and state under penalty of perjury:

I am a Special Agent with the Federal Bureau of Investigation (FBI), and have reason to believe that certain property, namely:

**All funds and securities contained in the LPL Financial Accounts listed above; and**

**All funds contained within the OnPoint Community Credit Union Accounts listed above,**

is property that constitutes or is derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, Wire Fraud, and is property involved in or traceable to property involved in a violation of 18 U.S.C. § 1956, laundering of monetary instruments. The property described above and held by the above institutions is therefore subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) and is forfeitable pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C), 982(a)(1) and 28 U.S.C. § 2461(c).

The facts to support a finding of probable cause for issuance of a Seizure Warrant are as follows:

SEE ATTACHED AFFIDAVIT, incorporated herein.

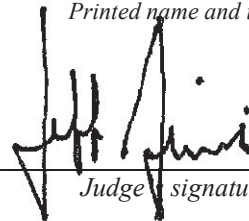
Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at  
5:55 a.m./6:11 p.m.

Date: January 31, 2024.

Portland, Oregon

JARED ROLLINS, Special Agent, FBI

*Printed name and title*

A handwritten signature in black ink, appearing to read "Jeff Armistead", written over a horizontal line.

*Judge signature*

JEFFREY ARMISTEAD, U.S. Magistrate Judge

*Printed name and title*

DISTRICT OF OREGON, ss:           AFFIDAVIT OF JARED ROLLINS

**AFFIDAVIT IN SUPPORT OF AN APPLICATION  
FOR SEIZURE WARRANTS**

I, Jared Rollins, being duly sworn, do hereby depose and state as follows:

**BACKGROUND/EXPERIENCE**

1.       I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since July 2018. I am currently assigned to the Portland Field Office of the FBI. In 2018, I successfully completed twenty-one (21) weeks of training at the FBI Academy located in Quantico, Virginia. During that time, I was taught the use and practical application of various investigative techniques that federal law enforcement officers are allowed to employ. I have received specialized training in the investigation of complex financial crimes, provided by the FBI or DOJ.

2.       I am familiar with the circumstances of the offenses described in this affidavit through a combination of personal knowledge of the facts, discussion with other law enforcement officials, and other investigative activities conducted, and investigative materials obtained during the investigation.

**PURPOSE OF THIS DECLARATION**

3.       This affidavit is being submitted in support of an Application for Seizure Warrant for the below listed property:

- a. All funds and securities contained within the following LPL Financial Accounts:
  - i. 7026-0343 - Lebedenko Family Trust
  - ii. 1067-0573 - PTC Cust 5305 SEP IRA FBO Sergey V Lebedenko

**Affidavit of SA Jared Rollins**

- iii. 2939-0592 - Yekaterina Dickinson
  - iv. 3494-1593 - PTC Cust 5305 SEP IRA FBO Aliona Lebedenko
  - v. 3253-2037 - N650SM LLC
  - vi. 5472-2209 - PTC Cust 5305 SEP IRA FBO Aliona Canche
  - vii. 3126-2569 - Aliona Canche TOD Account
  - viii. 5271-3034 - Sergey & Galina Lebedenko JTEN TOD
  - ix. 1165-4512 - PTC Cust 5305 SEP IRA FBO Galina Lebedenko
  - x. 7124-4613 - PTC Cust ROTH IRA FBO Aliona Canche
  - xi. 6216-6310 - PTC Cust ROTH IRA FBO Marcus Lee Dickinson
  - xii. 7480-6527 - Sergey & Galina Lebedenko JTEN TOD
  - xiii. 2959-6702 - Yekaterina Dickinson TOD Account
  - xiv. 1674-7683 - PTC Cust 5305 SEP IRA FBO Yekaterina Lebedenko
  - xv. 5721-7733 - PTC Cust ROTH IRA FBO Yekaterina Lebedenko
- b. All funds contained within the following OnPoint Community Credit Union Accounts:
- i. 1012808-1 - Sergey & Galina Lebedenko
  - ii. 1012808-8 - Sergey & Galina Lebedenko
  - iii. 1291730-1 - Astra Car Service LLC c/o Sergey Lebedenko
  - iv. 1291730-22 - Astra Car Service LLC c/o Sergey Lebedenko

4. Based on information contained in this affidavit, there is probable cause to believe, and I do believe, the listed assets are property constituting or derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, Wire Fraud, and are

**Affidavit of SA Jared Rollins**



property involved in or traceable to property involved in a violation of 18 U.S.C. § 1956, laundering of monetary instruments. Furthermore, there is probable cause that the property is subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) and subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C), 982(a)(1), and 28 U.S.C. § 2461(c).

5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrants. The facts set forth in this affidavit are based on information known to me from my training, experience, and personal knowledge, by written and oral reports provided by witnesses and other law enforcement officers involved in the investigation, and review of records obtained throughout the investigation. Since this affidavit is being submitted for this limited purpose, I have not included each and every fact known to me concerning this investigation but only information sufficient to show probable cause that the property in question is subject to seizure and forfeiture. This affidavit involves an investigation by the Federal Bureau of Investigation (FBI) and the Internal Revenue Service Criminal Investigations Unit (IRS-CI) into Sergey and Galina Lebedenko (husband and wife), hereinafter, the Lebedenkos.

## **STATEMENT OF PROBABLE CAUSE**

### **Summary of the Investigation**

6. The FBI initiated an investigation regarding the Lebedenkos based on information provided by representatives of the Portland-based litigation firm, Angeli Law Group LLC (“ALG”). ALG was engaged to represent the victim (“V-1”)<sup>1</sup> in this matter. ALG presented information alleging that between approximately November 2016 and November 2023, the

---

<sup>1</sup> For the purposes of this affidavit, the victim, known by law enforcement, will be referred to as V-1.  
**Affidavit of SA Jared Rollins**

Lebedenkos, through their wholly owned company Astra Car Service, LLC, stole over \$34 million from V-1.

7. On January 22, 2023, the Lebedenkos were charged via a criminal complaint with wire fraud and money laundering related to the conduct described in this affidavit. They were arrested on January 23, 2024, and are currently on pretrial release.

8. On May 28, 2004, the Lebedenkos filed an application for registration with the Oregon Secretary of State, Corporation Division for Astra Limousine and Town Car Service.

9. On April 12, 2016, the Lebedenkos filed articles of organization with the Oregon Secretary of State for Astra Car Service, LLC (“Astra”). The address listed is 4506 SE Andereg Loop, Portland, Oregon. The Registered Agent at that date was Sergey Lebedenko (“Sergey”) and the Authorized Agent bore the electronic signature of Galina Lebedenko (“Galina”).

10. On January 4, 2023, FBI and IRS-CI agents spoke with V-1. V-1 recounted that in or around 2006 or 2007, V-1 hired Sergey to provide intermittent personal transportation services.

11. Since Sergey was not a full-time employee, he was not paid on a scheduled basis and was not paid through any payroll by V-1. Sergey was eventually given authorization to charge V-1’s American Express (“AMEX”) card for the sole purpose of payment for actual services rendered.

12. Based on review of documents provided by AMEX, I know that for AMEX, a charge is initiated at a keypad or point of sale terminal, flows via a wire through a third-party processor, and is simultaneously authorized via an AMEX facility in Whitsett, North Carolina. According to V-1’s AMEX statements, the entirety of Astra’s charges was initiated in Portland, Oregon.

**Affidavit of SA Jared Rollins**

This indicates that Astra's charges would have been transmitted by interstate wires to be approved and funded by AMEX.

13. In the following years, Sergey quickly gained the trust of V-1. Sergey convinced V-1 to give him more responsibility with managing various aspects of V-1's personal estate, including but not limited to handyman services, housesitting for V-1's Portland-area home, oversight for maintenance and groundskeeping staff, and running errands for V-1 and V-1's partner.

14. Sergey originally charged V-1 \$90 an hour using V-1's AMEX card. When the business relationship evolved to include these additional responsibilities, V-1 discussed reducing the rate to half the original \$90 per hour.

15. Over the ensuing years, V-1 met Galina several times. Galina occasionally would help provide services to V-1. Galina was responsible for processing the charges to V-1's AMEX. When V-1 posed a question in the past about charges, Sergey would refer V-1 to Galina.

16. The following is an invoice that Galina emailed to V-1 in September 2013:

---

From: <astralimo@aol.com>  
 Sent: Mon 9/30/2013 4:30:42 PM (UTC-08:00)  
 To: [REDACTED]  
 Subject: Invoice #531 from Astra Limousine and Town Car service  
 Attachment: inv\_4931\_from\_Astra\_Limousine\_and\_Town\_Car\_service\_2108.pdf

Dear [REDACTED]

Your paid invoice is attached.

"QTY" is how many hours that day. "PRICE" is how much per hour. "AMOUNT" is total amount for that day hours. And on the bottom is "BALANCE DUE" is zeros.

This is how this program works.

Thank you for your kind order, we appreciate it very much!

Sincerely,  
 Galina

Astra Limousine and Town Car service  
 503-539-5531

**Affidavit of SA Jared Rollins**

Astra Limousine and Town Car service  
4506 SE Anderson Loop  
Portland, OR 97236

# Invoice

Date: 9/28/2013  
Invoice #: 4931

**PAID**  
09-30-2013

Bill To: [REDACTED] Ship To: [REDACTED]

P.O. # \_\_\_\_\_ Ship Date: 9/28/2013  
Terms: weekly Due Date: 9/28/2013  
Other: \_\_\_\_\_

Item	Description	Qty	Price	Amount
1 taxi	Lexus cleaning inside, outside, trunk and after pain \$360	6	60.00	360.00
7 hours driving	7 hours driving 09-24-13 \$630	7	90.00	630.00
2 hours	Walk, drive to swim 09-24-13 \$120	2	60.00	120.00
2 hours driving	09-24-13 2 hours driving \$180	2	90.00	180.00
1 hour	09-24-13 walk dinner play and sitting \$80	1	80.00	80.00
7 hours driving	09-26-13 7 hours driving and snacks \$630	7	90.00	630.00
2 hours	09-25-13 walk lunch, pills \$120	2	60.00	120.00
7 hours driving	09-26-13 driving and snacks \$630	7	90.00	630.00
3 hours	09-26-13 Morning and evening walk and play, food and pills \$180	3	60.00	180.00
6 hours driving	09-27-13 driving and snacks \$540	6	90.00	540.00
2 hours	09-27-13 Walk and play \$120	2	60.00	120.00
Subtotal				\$3,570.00
Sales Tax (0.0%)				\$0.00
Total				\$3,570.00
Payments/Credits				-\$3,570.00
Balance Due				\$0.00

Astra Limousine and Town Car service  
astralimo@aol.com  
www.astralimo.com

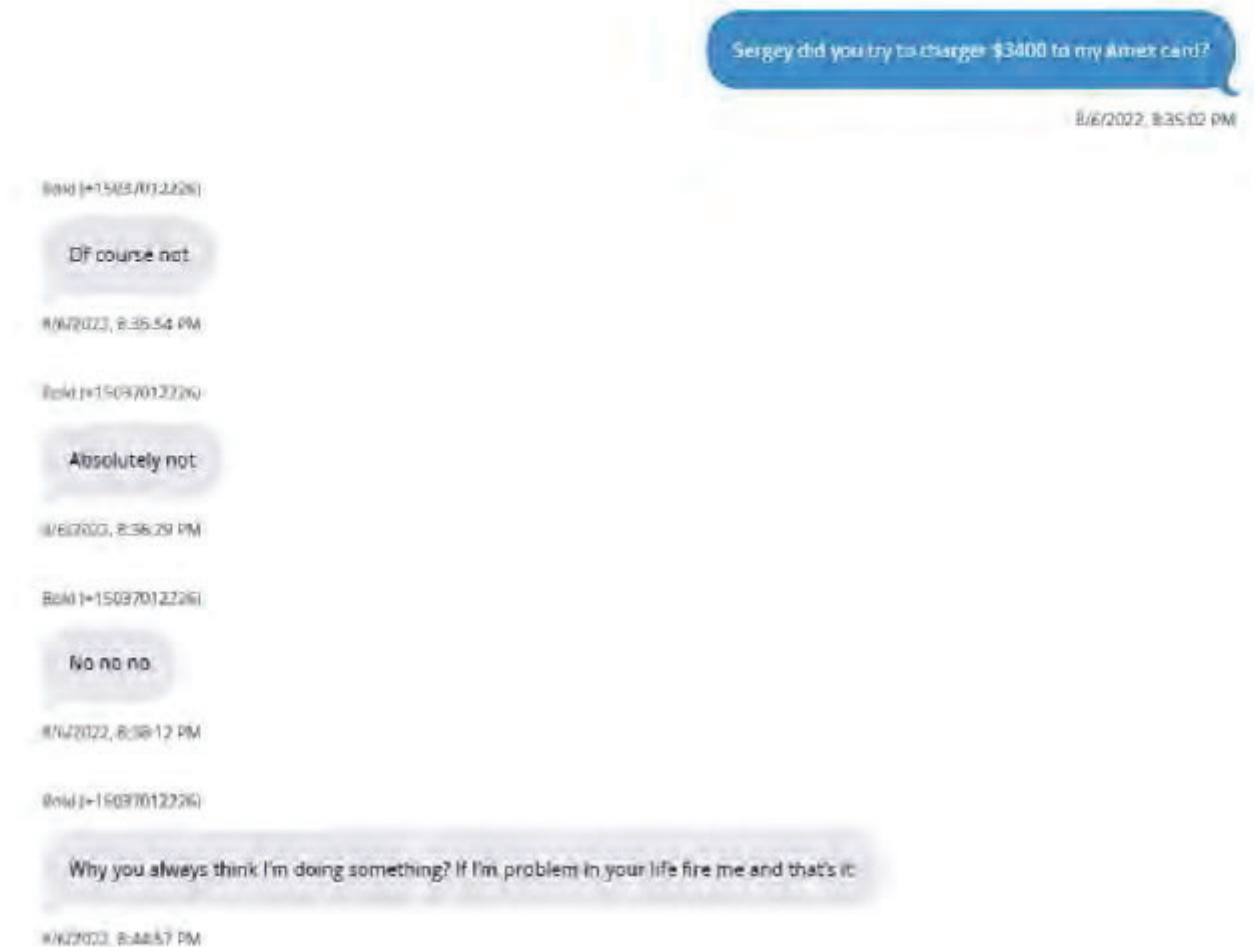
503.530-5531

17. Monthly statements for the AMEX card were typically delivered to V-1's New York apartment, so they were not seen by V-1. The AMEX card was also set up on autopay so that the balance would automatically be paid off using funds from V-1's personal account.

18. A review of V-1's AMEX statements showed between April 1 and April 30, 2022, Sergey and Galina charged V-1's AMEX card 225 times for a total of \$602,490. This is an average of 7.5 transactions per day with an average transaction amount of \$2,677. V-1 was only in Portland for eight days during that month, between April 6 and April 13, 2022. V-1 spent the rest of the month outside the Portland area and was not receiving daily services from Sergey or Galina. V-1's long-term partner did not spend any time in the Portland area in April 2022.

19. Over a seven-day period, from April 24 to April 30, 2022, Sergey and Galina charged V-1's AMEX card 180 times for a total amount of \$497,490. During this time, V-1 and his partner had minimal interaction with Sergey.

20. V-1 occasionally discovered Sergey and Galina had overcharged V-1's AMEX. On one such occasion, on August 6, 2022, V-1 confronted Sergey via iMessage. The exchange is reprinted below, with V-1's messages appearing as blue (dark) bubbles and Sergey's responses appearing as gray (light) bubbles:



21. Although on August 6, 2022, Sergey denied charging V-1's AMEX \$3,400, financial records show that Sergey and Galina had, in fact, charged V-1's AMEX \$28,900 over the two-day period of August 5-6, 2022, as shown in the following table of charges:

TRANSACTION DATE	PAYEE	AMOUNT
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	500.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	2,900.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	2,800.00

**Affidavit of SA Jared Rollins**

08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	1,100.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	3,100.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	3,500.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	2,800.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	800.00
08/05/22	ASTRA CAR SERVICE LLC 00-08002866831	900.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	3,100.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	3,300.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	1,200.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	2,500.00
08/06/22	ASTRA CAR SERVICE LLC 00-08002866831	400.00
		<hr/> 28,900.00 <hr/>

22. Fifteen months later, on or about November 18, 2023, V-1 discovered that his AMEX had been charged between 10 and 15 times by Astra during a period of weeks where V-1 was outside the Portland area and not using Astra's services.

23. V-1 confronted Sergey about the charges and told Sergey to stop charging him until they could discuss the charges. V-1 threatened to fire Sergey. V-1 later found out that additional charges had been made to his AMEX after the time V-1 told Sergey to stop. V-1's AMEX was charged approximately 108 additional times for an approximate amount of \$15,703. V-1 ultimately blocked further charges on the card by contacting AMEX.

**Affidavit of SA Jared Rollins**



24. The following is the November 18, 2023, text exchange between V-1 and Sergey with the blue (dark) bubbles<sup>2</sup> representing V-1 and the gray (light) bubbles representing Sergey:

Sergey American Express tells me you have charged me about approxabout \$300,00 over the course of October and November, probably more. I warned you about this and you and Galina didn't pay any attention. If this keeps up even a little bit longer you will be fired for sure.

11/18/2023, 7:38:38 PM

██████ got your warning and sorry about that, Galina didn't charge you more then we agreed with you last year, there's probably other charges coming from, if you think I'm spending all your money then definitely fire me and you will be more comfortable with me and working for you. I'm very upset 😡 now because my daughter lost her unborn baby and on top of that you texted me about money. So you have all power to fire me but it's not only about money, it also relationship for long time with you and you know I can work for free for you because you been like my father to me. Sorry about that again and have fun at golden door little vacation! I love you Boss ❤️

11/18/2023, 8:07:58 PM

Sergey I'm going create a system requiring you to submit Invoices to my accountant twice a month and he will pay you if I approve the amount. You will only be able to use the Amex card to make charges that are for me, not for yourself. We will negotiate an hourly rate for you based on standard Portland rates. If this is not Ok for you we will have to part ways. Either way, Galina will never again charge me +500 a day virtually every day of the month.

11/18/2023, 8:21:32 PM

You need to talk to Galina about all of this, she's my office worker and I'm outside working so whatever you think is best for you then do it. Remember Galina is the Boss on my side not me. And I asked you multiple times to have meeting with you about this and you refused to do it. I'm sorry again.

11/18/2023, 9:03:40 PM

---

<sup>2</sup> The text from V-1 to Sergey is displayed as originally sent and contains a numerical error. "\$300,00" should read "\$300,000".



25. V-1 later discovered that Astra had charged approximately \$34 million to V-1's AMEX card between 2016 and late 2023. V-1 discovered that the Lebedenkos had acquired several assets seemingly without encumbrances during the time they were over-charging V-1. These assets include, in approximate amounts, a \$2 million dollar residence in Bermuda Dunes, California; a \$2.3 million residence in Sunriver, Oregon; and several other properties in the Portland, Oregon, and Battleground and Vancouver, Washington, areas. Several of these properties have been placed in nominee names either through the purchase or later title transfer.

26. The investigation identified two specific properties located in Happy Valley, Oregon. These properties were both purchased in the name of the Lebedenko Family Trust, both properties were paid for with funds believed to be stolen from V-1, and both properties are occupied by the Lebedenkos' daughters; Aliona Canche ("Aliona") and her husband Isaiah Canche, and Yekaterina ("Yekaterina") Dickinson and her husband Marcus Dickinson.

27. Social media research shows pictures of Sergey and Galina celebrating the purchase of one of the Vancouver, Washington properties. It was also discovered that in October 2023, Sergey and Galina filed a quit claim deed on another Vancouver, Washington, property they had previously purchased and gifted to their religious pastor, Vasiliy Yarosh.

28. Based on a currency transaction report, Investigators determined that the Lebedenkos use OnPoint Community Credit Union ("OnPoint") for banking. OnPoint records indicate that the Lebedenkos have several related accounts, including a personal checking account ending 2808-8 and a connected savings account ending 2808-1, both held in the names of Sergey and Galina Lebedenko; and a business checking account ending 1730-22 and connected savings account ending 1730-1, held in the name of Astra Car Service LLC c/o Sergey Lebedenko.

**Affidavit of SA Jared Rollins**

29. A preliminary review of the Astra business checking account ending in 1730-22 identified merchant service (credit card processor) deposits in excess of \$32.8 million between January 2018 and January 2024. Records suggest that almost all those deposits came from charges to V-1's AMEX card. In November 2021, for instance, Astra's business checking account received 55 deposits totaling \$797,090, from Astra's merchant service provider. Fifty-four of those deposits—comprising all but \$100 of that sum—were derived from charges to just one card: V-1's AMEX. Investigators' review to date of all financial accounts determined to be associated with the Lebedenkos reveals no other significant preexisting assets or sources of income.

30. During this same review period, there were internal transfers made to several other OnPoint accounts including the Lebedenkos' personal checking account ending 2808-8 and savings account ending 2808-1. These two accounts received transfers of more than \$21.5 million from both the Astra business checking and savings accounts. Sergey and Galina also received what appear to be two separate bi-weekly payroll deposits from the Astra business checking account ending 1730-22 into their personal checking account ending 2808-8, in excess of \$1.46 million for the same time period. These transfers and payroll deposits appear to be the Lebedenkos' primary source of income.

31. Subpoenas were served on several title companies for records related to the real estate purchases made by the Lebedenkos. The initial review of those records shows that several of the properties were funded by wire transfers from an Edward Jones account and identify the account as belonging to the Lebedenko Restated Family Trust.

**Affidavit of SA Jared Rollins**

32. A preliminary review of the Lebedenkos' personal checking account ending 2808-8 identified 12 checks made payable to Edward Jones between September 2019 and September 2022, several of them referencing "trust" in the memo line. These checks totaled \$6.7 million dollars.

33. On January 18, 2024, a subpoena was served on Edward Jones for account records. Edward Jones provided an initial response that included holding pages identifying seven accounts previously held by the Lebedenkos and the trust that have since been closed. Edward Jones also provided copies of monthly account statements. A review of those statements shows that by April 2023, all seven accounts had been closed and the balance of funds, totaling more than \$3.3 million, had been transferred to LPL Financial.

34. This investigation has shown that Sergey and Galina Lebedenko have historically opened accounts in the names of their daughters and funded those accounts directly. Based on this knowledge, a second subpoena was served on January 29, 2024, expanding the request to include additional accounts. Edward Jones responded with records to include holding pages identifying seven additional accounts previously held in the names of Yekaterina and Aliona that have since been closed. Edward Jones again provided copies of monthly account statements. A review of those statements shows that by April 2023, all seven accounts had been closed and the balance of funds, totaling approximately \$396,000, had been transferred to LPL Financial.

35. A preliminary review of the Lebedenkos' personal checking account ending 2808-8 also identified four outgoing checks deposited into an LPL Financial account totaling \$662,000. Two of the checks referenced IRA contributions to multiple accounts. For example, check number 3660 dated March 9, 2023, in the amount of \$123,000 was made payable to LPL

**Affidavit of SA Jared Rollins**

Financial and deposited into an LPL Financial account at Bank of America. The memo line on the check read as follows:

#1067-0573 \$57,000	(identified as an IRA for the benefit of Sergey)
#1674-7683 \$10,000	(identified as an IRA for the benefit of Yekaterina)
#1165-4512 \$46,000	(identified as an IRA for the benefit of Galina)
#5472-2209 \$10,000	(identified as an IRA for the benefit of Aliona)

36. On January 23, 2024, during the execution of a search warrant on the Lebedenkos' personal residence, investigators discovered an account statement from Kingdom Wealth Group. LPL Financial is the broker dealer for Kingdom Wealth Group. The statement showed a balance in excess of \$900,000 in an account belonging to the Lebedenkos.

37. On January 24, 2024, a subpoena was served on LPL Financial for account records. The initial response included copies of account statements for the 15 accounts listed in this affidavit. This list includes the four accounts referenced on the above identified check and additional accounts set up for the benefit of the Lebedenkos, their daughters Aliona and Yekaterina, and even an account for the benefit of Yekaterina's husband, Marcus Dickinson.

38. According to the statements, the ending balances of the LPL Financial accounts as of December 31, 2023, totaled in excess of \$4.1 million. For the reasons stated in this affidavit, I believe these accounts contain funds traceable to the fraud and money laundering described above and are therefore subject to seizure and forfeiture.

### CONCLUSION

39. Based on the facts set forth herein, I believe that probable cause exists to show the listed assets are property constituting or derived from proceeds obtained directly or indirectly as a result of violations of 18 U.S.C. § 1343, Wire Fraud and are property involved in a violation of 18 U.S.C. § 1956 or traceable to such property. Furthermore, there is probable cause that the

**Affidavit of SA Jared Rollins**

property is subject to seizure pursuant to 18 U.S.C. § 981(b) and 21 U.S.C. § 853(f) and subject to forfeiture pursuant to 18 U.S.C. §§ 981(a)(1)(A) & (C), 982(a)(1), and 28 U.S.C. § 2461(c).

40. On January 30, 2024, investigators were made aware by representatives of LPL Financial that Sergey Lebedenko made a request to withdraw \$10,000 out of one of his LPL Financial accounts. Furthermore, I submit that an order under 21 U.S.C. § 853(e) may not be sufficient to assure the availability of the property for forfeiture because securities and funds held in exchange accounts can be rapidly and easily transferred and concealed.

41. Prior to being submitted to the Court, this affidavit for seizure warrant was reviewed by Assistant United States Attorney (AUSA) Katie de Villiers, and AUSA de Villiers advised me that in her opinion the affidavit and application are legally and factually sufficient to establish probable cause to support the issuance of the requested warrants.

---

JARED ROLLINS, *via telephone*  
Special Agent  
Federal Bureau of Investigation

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at  
5:55 a.m/p.m. on January 31, 2024.



---

JEFFREY ARMISTEAD  
United States Magistrate Judge